

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

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JOHNNY HA, JENNY PHAM a/k/a )  
JENNY HA, and HELEN LE, )  
 )  
 *Plaintiffs,* )  
 )  
 v. )  
 )  
 TINA CONN, )  
 )  
 *Defendant.* )  
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Civil Action No. 2:20-cv-155-wks

**DECLARATION OF DANIEL A. SEFF IN SUPPORT OF PLAINTIFFS' APPLICATION FOR  
ATTORNEY'S FEES INCURRED IN CONNECTION WITH PLAINTIFFS' MOTION FOR CIVIL  
CONTEMPT SANCTIONS AGAINST DEFENDANT TINA CONN**

DANIEL A. SEFF hereby declares under penalty of perjury as follows:

1. I am a member of MSK Attorneys in Burlington and I represent Plaintiffs Johnny Ha, Helen Le and Jenny Pham (also known as Jenny Ha), collectively "Plaintiffs," in the above-captioned action.
2. I make this Declaration in support of Plaintiffs' request for attorney's fees incurred in connection with Plaintiffs' February 15, 2022 Motion for Civil Contempt Sanctions against Defendant Tina Conn (the "Contempt Motion" or the "Motion") (ECF No. 32).
3. On March 22, 2022, this Court issued an Opinion and Order granting the Contempt Motion (ECF No. 36).
4. Therein, the Court granted Plaintiffs' request for reasonable attorney's fees (ECF No. 36, at 5).
5. I reviewed my time records concerning the preparation of the February 15th Contempt Motion as well as the preparation of Plaintiffs' March 7, 2022 Notice of Non-

Opposition of Defendant Tina Conn to the Contempt Motion (ECF No. 35). The amount of legal fees Plaintiffs have incurred to date as a result of my preparing these Motion papers is **\$3,465.00.**

6. The \$3,465.00 figure is made up of 9.9 hours of my time at my current rate of \$350.00 per hour. Such time was spent researching and drafting the Contempt Motion and drafting the Notice of Non-Opposition.

7. My time spent preparing this Declaration is not included in the 9.9 hours described above.

WHEREFORE, Plaintiffs respectfully request an award of reasonable attorney's fees in the amount of \$3,465.00.

**Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct.**

Dated: March 23, 2022  
Burlington, Vermont

Respectfully submitted,

MSK ATTORNEYS



By: \_\_\_\_\_  
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